

ICC Docket No. 15-0142  
Responses of the People of the State of Illinois  
to Ameren Illinois Company's  
Seventh Set of Data Requests  
Requested: August 19, 2015  
Responded: August 20, 2015  
Sponsored by: David J. Effron

**AIC-AG 7.13** Referring to Mr. Effron's adjustment for Accounts Payable – Gas Stored Underground shown on AG Exhibit 4.1 REV, Page 8, identified as Schedule DJE B-2, please answer the following:

- a) Does Mr. Effron agree that AIC's response to ENG 11.04 Attach formed the basis for the Rebuttal adjustments to Gas In Storage – Materials and Supplies proposed by ICC Staff witness Mr. Lounsberry, and accepted by the Company in its Surrebuttal filing, as reflected on Ameren Exhibits 34.1-34.3, Schedule 2? If Mr. Effron does not agree, please fully explain and provide his understanding of the source for the Surrebuttal adjustments for Gas In Storage – Materials and Supplies shown on Ameren Exhibit 34.1-34.3, Schedule 2, Page 2, column (c).
- b) Does Mr. Effron agree that the Company's Surrebuttal requested amount of Gas Stored Underground, prior to application of the Accounts Payable adjustment, is \$71,200,000, and the adjustment for Accounts Payable is \$4,568,000, for a net requested amount of \$66,633,000, as shown on AIC's response to ENG 11.04 Attach, Schedule B-8.1, Rows 5, 7, and 8, respectively. If Mr. Effron does not agree, please fully explain and provide Mr. Effron's understanding of the source for the Company's Surrebuttal requested amount for Gas In Storage – Materials and Supplies.
- c) Does Mr. Effron agree that if he corrected AG Exhibit 4.1 REV, Page 8, to reflect a starting point based on the Company's Surrebuttal filing, the amounts shown would change as follows:
  - i) Gas Stored Underground would change from \$76,041,000 to \$71,200,000
  - ii) Accounts Payable Related to Gas Stored Underground would change from \$8,045,000 to \$7,533,000
  - iii) Accounts Payable Related to Gas Stored Underground, per AIC would change from \$4,879,000 to \$4,568,000
  - iv) Adjustment to Accounts Payable - Gas Stored Underground would change from \$3,166,000 to \$2,965,000 with adjustments of \$577,000 for Rate Zone I, \$911,000 for Rate Zone II of \$1,478,000 for Rate Zone III

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- v) If Mr. Effron's response to subparts i-iv is anything other than an unqualified yes, please fully explain and provide a corrected calculation, with working formulas intact.

**Response:**

- a) Mr. Effron agrees that AIC's response to data request ENG 11.04, Attach formed the basis of the referenced adjustments.
- b) No. The "Total Gas Stored Underground and Materials & Supplies Net of Related Accounts Payable" in AIC's response to data request ENG 11.04, Attach is \$73,292,000, whereas the total "Materials & Supplies Inventory" for the three rate zones combined on Page 3 of Ameren Exhibits 34.1, 34.2 and 34.3 is \$74,730,000.

Based on MFR Schedule B-8.1, the Company's Surrebuttal requested amount of Gas Stored Underground, prior to application of the Accounts Payable adjustment, is \$72,737,000, and the adjustment for Accounts Payable is \$4,666,000, for a net requested amount of \$68,071,000 (which equals \$71,162,000 on Line 8 - \$3,091,000 on Line 9a).

Mr. Effron believes that the Surrebuttal requested amount of net Gas Stored Underground is based on a number of sequential, incremental adjustments to the net Gas Stored Underground in the Company's initial filing, rather than taking the Gas Stored Underground and associated accounts payable directly from AIC's response to data request ENG 11.04, Attach, Line 10 as the Surrebuttal requested amount of Gas Stored Underground Net of Related Accounts Payable. Mr. Effron is unable to reconcile the apparent discrepancy.

- c) Mr. Effron agrees that if total "Materials & Supplies Inventory" for the three rate zones combined on Page 3 of Ameren Exhibits 34.1, 34.2 and 34.3 were revised to total \$73,292,000 (with \$14,639,000 for RZ I, \$22,336,000 for RZ II, and \$36,317,000 for RZ III) to comport with the response to ENG 11.04, then on AG Exhibit 4.1 REV, Page 8:
- i.) Gas Stored Underground would change from \$76,041,000 to \$71,200,000;
  - ii.) Accounts Payable Related to Gas Stored Underground would change from \$8,045,000 to \$7,533,000;
  - iii.) Accounts Payable Related to Gas Stored Underground, per AIC would change from \$4,879,000 to \$4,568,000;
  - iv.) Adjustment to Accounts Payable - Gas Stored Underground would change from \$3,166,000 to \$2,965,000 with adjustments of \$577,000 for Rate Zone I, \$911,000 for Rate Zone II, and \$1,478,000 for Rate Zone III;
  - v.) N/A.